WEILAND GOLDEN GOODRICH LLP 1 Jeffrey I. Golden, State Bar No. 133040 jgolden@wgllp.com Ryan W. Beall, State Bar No. 313774 rbeall@wgllp.com 650 Town Center Drive, Suite 600 Costa Mesa, California 92626 Telephone 714-966-1000 Facsimile 714-966-1002 Attorneys for Debtor and Debtor-in-Possession SOUTHERN INYO HEALTHCARE DISTRICT 7 UNITED STATES BANKRUPTCY COURT 8 9 **EASTERN DISTRICT OF CALIFORNIA** FRESNO DIVISION 10 In re Case No. 1:16-bk-10015-FEC 11 SOUTHERN INYO HEALTHCARE Chapter 9 12 DISTRICT, 13 WGG-2 Debtor. 14 STIPULATION TO CONTINUE DEBTOR'S 15 **OBJECTION TO PROOF OF CLAIM 48-1** 16 FILED BY TULARE LOCAL HEALTHCARE DISTRICT 17 Hearing: Date: October 23, 2019 18 Time: 1:30 p.m. Dept. A, Ctrm. 11 Place: 19 U.S. Bankruptcy Court 2500 Tulare Street 20 Fresno, CA 93721 21 22 TO THE HONORABLE FREDERICK E. CLEMENT, UNITED STATES BANKRUPTCY 23 JUDGE AND ALL PARTIES IN INTEREST: 24 Southern Inyo Healthcare District ("Debtor" or "Debtor-in-Possession"), and Tulare 25 Local Healthcare District ("Tulare," and together with Debtor, the "Parties"), by and 26 through their undersigned counsel, enter into this Stipulation to Continue Hearing on 27 28 0.0 **STIPULATION**

3 4 5 6 8 10 // 11 // 12 // 13 // 14 // 15 // 16 // 17 // // 18 19 // 20 // 21 // 22 23 // 24 // 25 // 26 // 27

1

Debtor's Objection to Proof of Claim 48-1 Filed by Tulare Local Healthcare District ("Stipulation") as follows:

RECITALS

- 1. On July 8, 2019, Debtor filed Objection to Proofs of Claim Number 48-1 filed by Tulare Local Healthcare District ("Objection") [Dkt. 619].
- 2. On July 8, 2019, Debtor filed a Notice of Hearing, setting the hearing on the Objection ("Hearing") for August 28, 2019 [Dkt. 1547].
- 3. The Parties seek to continue the Hearing on the Objection to a mutually agreed upon date of October 23, 2019, at 1:30 p.m.

28

0.0

2 STIPULATION

1 **STIPULATION** 2 NOW THEREFORE, based upon the foregoing recitals, and subject to Court approval, the Parties hereby stipulate and agree as follows: 4 The Hearing on the Debtor's Objection to Proof of Claim 48-1 Filed by Tulare a. 5 Local Healthcare District shall be continued to October 23, 2019, at 1:30 p.m.; 6 b. Tulare's opposition to the Objection shall be filed and served no later than October 9, 2019; 8 Debtor's reply, if any shall be filed and served no later than October 16, C. 2019. 10 IT IS SO STIPULATED. Dated: August 15, 2019 WEILAND GOLDEN GOODRICH LLP 11 12 By: /s/ Jeffrey I. Golden 13 Jeffrey I. Golden 14 Attorneys for Debtor Southern Inyo Healthcare District 15 Dated: August , 2019 WAGNER JONES HELSELY PC 16 17 By: 18 Riley C. Walter Attorneys for Tulare Local 19 Healthcare District 20 21 22 23 24 25 26 27 28 0.0 **STIPULATION** 3

8

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

NOW THEREFORE, based upon the foregoing recitals, and subject to Court approval, the Parties hereby stipulate and agree as follows: a. The Hearing on the Debtor's Objection to Proof of Claim 48-1 Filed by Tulare Local Healthcare District shall be continued to October 23, 2019, at 1:30 p.m.; b. Tulare's opposition to the Objection shall be filed and served no later than October 9, 2019;

c. Debtor's reply, if any shall be filed and served no later than October 16,2019.

IT IS SO STIPULATED.

Dated: August , 2019 WEILAND GOLDEN GOODRICH LLP

Ву:

3

Jeffrey I. Golden Attorneys for Debtor Southern Inyo Healthcare District

Dated: August 14, 2019 WANGER JONES HELSLEY PC

By: Riley C. Walter

Attorneys for Tulare Local

Healthcare District